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Friday, July 25, 2025

The Honorable Karen M. Williams
United States District Judge District of New Jersey
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: <u>Dimov Associates LLC et al v. Marc Wasserman et al</u>
Case No. 1:25-cv-05410-KMW-AMD

Dear Judge Williams:

The parties provide the Court with this status update in the above-captioned matter pursuant to the Court's order dated July 11, 2025 (see ECF Nos. 31 - 32).

Defendant Marc Wasserman

Defendant Wasserman was served the Order to Show Cause by electronic mail in accordance with that order. Defendant Wasserman has appeared, and representation is underway. Counsel for Plaintiff and defendant Wasserman are negotiating a stipulated consent order regarding the Order to Show Cause.

Defendants David Kane and Selective Financial Solutions

Defendants Kane and Selective Financial Solutions were served with the Order to Show Cause by electronic mail in accordance with that order on May 29, 2025. Neither Kane nor Selective Financial Solutions acknowledged receipt.

Rule 4 service on defendants Kane and Selective Financial Services is currently underway; however, according to our service processor, Selective Financial Solutions could not be served at its registered address in Pennsylvania (electronic case filing forthcoming) and the service processor has not yet attempted to serve Mr. Kane.

Requested Relief

With respect to defendants Kane and Selective Financial Solutions, who have failed to respond to the Order to Show Cause despite electronic service in accordance with that Order, Plaintiffs respectfully request that the Court enter the temporary restraining order and preliminary injunction against these defendants by default.

Thank you for the Court's time and consideration.

Respectfully submitted,

ROMANO LAW PLLC

/s/ Dan Braverman

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